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Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re)	
)	
Lincoln Broadcasting, LLC)	MB Docket No. 11-192
)	
Petition for Rulemaking to Amend)	RM-11646
Section 73.622(b), DTV Table of Allotments,)	
Television Station KFXL-TV, Lincoln, Nebraska)	
)	
To: The Secretary		
Attn: Chief, Media Bureau		

COMMENTS

Lincoln Broadcasting, LLC ("LBL"), the licensee of television broadcast station KFXL-TV, channel 51, Lincoln, Nebraska, Facility No. 84453 ("KFXL"), by its attorneys, hereby submits these comments in the above-captioned proceeding proposing to amend the DTV Table of Allotments, Section 73.622(i) of the Commission's rules (the "DTV Table"), to substitute channel 15 for channel 51 at Lincoln, Nebraska.¹

As LBL explained in its Petition for Rulemaking in this matter, the proposed channel substitution would serve the public interest by clearing the spectrum reserved for television channel 51 so that it can be more quickly auctioned to non-broadcast service providers.² LBL explained that in this situation it will not be necessary to enter into a relocation agreement because channel 15 at Lincoln, Nebraska currently is vacant. LBL further explained that the

¹ See *Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Television Broadcast Stations (Lincoln, Nebraska)*, Notice of Proposed Rulemaking, DA 11-1924 (rel. Nov. 22, 2011) ("*NPRM*").

² See "General Freeze on the Filing and Processing of Applications for Channel 51 Effective Immediately and Sixty (60) Day Amendment Window for Pending Channel 51 Low Power Television, TV Translator and Class A Applications," Public Notice, 26 FCC Rcd 11409 (Med. Bur. 2011) (lifting application filing freeze "as applied to...petitions for rulemaking filed by full power television stations seeking to relocate from channel 51 pursuant to a voluntary relocation agreement.")

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proposed facility for KFXL's channel 15 operations would: (a) provide less than 0.1 percent interference to the closest full-power stations operating on channel 15, which are in Worthington, Minnesota and Sedalia, Missouri, both of which are over 200 miles from Lincoln, Nebraska; (b) provide full principal community coverage to Lincoln, Nebraska and comply with all other relevant technical requirements necessary to amend the DTV Table; and (c) more than triple the net total population receiving KFXL's over-the-air signal, from 309,128 persons to 997,529 persons, and more than double the net area served, from 7,611 square kilometers to 18,422 square kilometers.

Accordingly, LBL supports the proposal set forth in the NPRM and hereby reaffirms its interest in the proposed channel substitution. Upon modification of the DTV Table as proposed in this proceeding, LBL intends to promptly file an application for construction permit seeking authority to operate KFXL on channel 15 at Lincoln, Nebraska and upon grant of such application, promptly implement operations pursuant thereto.

Respectfully submitted,

LINCOLN BROADCASTING, LLC

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January 6, 2012